

From: [DeMaria, Eva](#)
To: [Johnson, Laura](#)
Cc: [Kim, Stacey](#); [LIVERMAN Alex \(liverman.alex@deq.state.or.us\)](mailto:LIVERMAN.Alex@deq.state.or.us); [Matt McClincy \(mcclincy.matt@deq.state.or.us\)](mailto:mcclincy.matt@deq.state.or.us); [Sheldrake, Sean](#)
Subject: FW: Info on US Moorings and Navy Reserve Swan Island
Date: Friday, October 02, 2015 2:49:00 PM
Attachments: [US Army Corps.msg](#)
[FW UNITED STATES ARMY CORPS OF ENGINEERS WQSW-NWR-13-134 Notice of Civil Penalty Assessment Issued 12302013.msg](#)
[RE US Army Corps stormwater sampling results.msg](#)
[FW UNITED STATES ARMY CORPS OF ENGINEERS 13-134 Response to Notice of Civil Penalty Assessment.msg](#)
[FW Army Corps of Engineers draft FEA documents.msg](#)
[RE USACE contact for US Moorings dock removal coordination.msg](#)

Laura-

Thanks for talking with me about the US Moorings and USN facilities. Here's the email chain we discussed. As I mentioned, Alex requested EPA look into SW issues at both facilities as based on her knowledge of the sites, there were some concerns. However, after talking a bit more in depth with her this afternoon, it sounds like the concern at US Moorings was more the SW infiltration and impacts to GW. EPA apparently issued a RCRA 3013 order to the Corps to do an investigation of ongoing sources and they complied with and completed the order. Are you aware of any erodible soils, open areas in which SW could impact surface waters (even through the GW pathway)? You stated that US Moorings has been mostly cooperative. Most recently, they've exceeded their benchmarks and are now in the midst of implementing Tier 2 corrective actions. If you think it might be worthwhile for EPA to conduct a SW inspection of the site, I can request an inspection. It can be a joint inspection (whether EPA is the lead or not can be discussed later) and an opportunity for EPA to see and learn how BES conducts inspections and vice versa.

In regards to the US Naval facility, as I understand it, the facility does not have SW coverage because it doesn't fall under one of the SIC classifications. Do you know what activities occur at the facility? I looked at maps and noticed that there is a dock. Could the site fall under Sector Q (Water Transportation) or R (Ship and Boat Building and Repairing Yards)? It's unclear to me whether this site should be inspected under CWA or other authorities. Any insight would be appreciated. Thanks.

Eva

Eva DeMaria

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From: LIVERMAN Alex [<mailto:liverman.alex@deq.state.or.us>]

Sent: Thursday, July 30, 2015 2:53 PM

To: DeMaria, Eva

Cc: MCCLINCY Matt; Sheldrake, Sean

Subject: RE: Info on US Moorings and Navy Reserve Swan Island

Hi Eva.

The US Moorings site operates under the 1200Z permit. The City of Portland is DEQ's agent for the 1200Z registrants in Portland and inspects this facility. The latest inspection info, enforcement referrals and DEQ and USACE response documents are attached. I also included the email on contacts for the dock work coordination for the 404-like process that Sean mentioned. I believe the last contact, Jody Marshall, has left the USACE, though. Back to Chris Budai...

The Navy Reserve site was referred to EPA for source control work in 2011 after being non-

responsive to DEQ's efforts. There is very little information available on that site.

The Coast Guard site (next door to the Navy) has been cooperative on source control efforts with DEQ. Dan Hafley is the current project manager and we did a joint site visit with the City of Portland inspector a few years back. Even though USCG doesn't have a permit, it is a site with industrial activities that the City inspects every so often and gives technical advice to under their authority of the MS4 permit and City Code. USCG is currently implementing additional source control measures and subsequent effectiveness monitoring and we expect to write a SCD in 2016.

Thanks again for the offer of 1200Z enforcement help, but we have that covered through the appropriate channels (City referrals and DEQ Office of Compliance and Enforcement) per our Performance Partnership Agreement with EPA Region Office of Water. I will certainly keep you posted on sites that can use a nudge from EPA to support DEQ's requests for source control work (stormwater, groundwater or soils/banks), though, whether they have an NPDES nexus or not.

Talk to you again soon...

--Alex

From: DeMaria, Eva [<mailto:DeMaria.Eva@epa.gov>]

Sent: Thursday, July 30, 2015 2:26 PM

To: LIVERMAN Alex

Cc: MCCLINCY Matt; Sheldrake, Sean

Subject: Info on US Moorings and Navy Reserve Swan Island

Hi Alex-

During our meeting yesterday, you mentioned that DEQ/the City? had attempted to obtain SW information from US Moorings and the US Navy Reserve on Swan Island as part of your source control evaluations. Both have proven recalcitrant. If you could send me what inspection reports, storm water info you have on both sites, that would be most appreciated. Coast Guard too?

Also, as I've mentioned previously, and I know I'm sounding like a broken record, if you have facilities that are either taking either too long in complying with the 1200Z permit or the CWA, and you believe they need a little push (or inspection) from EPA, please pass those names on to me. The NPDES Compliance Unit here usually plans inspections a year ahead of schedule and the targeting for inspections in 2016 is happening now.

Thanks again.

Eva DeMaria

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